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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2013-557*

12 **CONNIE LEE MARKEL**
2117 Tennyson Drive
13 Flower Mound, TX 75028

A C C U S A T I O N

14 Registered Nurse License No. 790460

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 2. On or about January 28, 2011, the Board issued Registered Nurse License Number
23 790460 ("license") to Connie Lee Markel ("Respondent"). On or about October 10, 2011,
24 Respondent's license was inactivated. Respondent's license will expire on September 30, 2014,
25 unless renewed.

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1 CAUSE FOR DISCIPLINE

2 (Disciplinary Action by the Texas Board of Nursing)

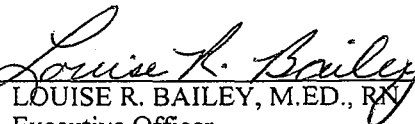
3 7. Respondent is subject to disciplinary action pursuant to Code section 2761,
4 subdivision (a)(4), on the grounds of unprofessional conduct, in that, on or about October 27,
5 2011, she was disciplined by the Texas Board of Nursing ("Texas Board") in the matter titled *In*
6 *the Matter of Registered Nurse License Number 705784 and Vocational Nurse License Number*
7 *186227 issued to Connie Lee Markel*, pursuant to the Agreed Order of the Texas Board. The
8 Agreed Order ordered Respondent shall receive the sanction of a Warning with Stipulations. A
9 true and correct copy of the Agreed Order is attached hereto, marked **Exhibit A**, and incorporated
10 herein. Said Agreed Order is based upon conclusions of law that Respondent had violated Texas
11 Occupations Code, section 301.452, subdivisions (b)(10) and (b)(13), and Texas Administrative
12 Code, Title 22, sections 217.11, subdivision (1)(D) and 217.12, subdivisions (1)(A) and (6)(A).

13 PRAYER

14 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
15 and that following the hearing, the Board of Registered Nursing issue a decision:

- 16 1. Revoking or suspending Registered Nurse License Number 790460, issued to Connie
17 Lee Markel;
- 18 2. Ordering Connie Lee Markel to pay the Board of Registered Nursing the reasonable
19 costs of the investigation and enforcement of this case, pursuant to Business and Professions
20 Code section 125.3;
- 21 3. Taking such other and further action as deemed necessary and proper.

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23 DATED: JANUARY 17, 2013


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant